

Notice and Acknowledgment for Service by Mail
 Circuit Court for Cass County
 Division 17

FILED
 CIRCUIT CLERK
 MO
 JUL 29 PM 2:18

Civil Action, File Number

Jeffrey M. Pearson "Pro-se"

P.O. Box 193

Warsaw Mo. 65355

Plaintiff,

Retiled JP.
06/26/2021

vs. City of Pleasant Hill Missouri

SGT. Todd M. Burris "official capacity"

Prosecuting Attorney Jeremy Cover "official capacity"

~~Clines Auto Body~~ Louber Municipal Law, LLC

250 N.E. Tudor Road

Lee's Summit, Mo. 64086

Clines Auto Body "Scott"

1107 Matthes, Ln.

Pleasant Hill, Mo. 64086, Dominick Maleno official capacity,
 Defendant.

CASE # 19CA-CC00285

Amended

JP
 06/26/2021

NOTICE AND ACKNOWLEDGMENT
 OF RECEIPT OF SUMMONS
 AND PETITION NOTICE

TO: (City of Pleasant Hill Missouri, 203 Paul St. Pleasant Hill Mo. 64086

SGT. Todd M. Burris, 203 Paul St. Pleasant Hill Mo. 64086

PO. Dominic Maleno, 203 Paul St. Pleasant Hill Mo. 64086

PA. Jeremy Cover Louber Municipal Law, LLC 250 N.E. Tudor Rd. Lee's Summit Mo. 64086

Clines Auto Body "Scott" 1107 Matthes, Ln. Pleasant Hill Mo. 64086

Circuit Court of Cass County

Division 17
State of Missouri

21CA-CC00158

Plaintiff

Jeffrey Michael Pearson

v.

Defendants

1. City of Pleasant Hill Missouri
2. Clines Autobody
3. Lauber Municipal Law LLC.
4. Jeremy Cover "Prosecuting Attorney" "Official Capacity"
5. Sgt. Todd M. Burris "Official Capacity" (Police Officer Pleasant Hill)
6. Police Officer Dominic Malena "Official Capacity" (Pleasant Hill).

Initial Petition

21 JUL 29 PM 2:20
FILED
CIRCUIT CLERK
CASS COUNTY MO.

Petition

FILED
CIRCUIT COURT
CLARK COUNTY, MISSOURI

21 JUL 29 PM 2:29

- I. 42 U.S.C. § 1983 - Unlawful Seizure, Detention, Search & Arrest (Violations of First & Fourteenth Amendments to the United States Constitution & comparable portions of the Missouri Constitution);
- II. 42 U.S.C. § 1983 - Unreasonable & Excessive Force (Violations of the 4th Amendment to the U.S. & comparable Missouri constitution.
- III. Municipal & Supervisory Liability (Section 1983, the 4th Amendment to the U.S.C. & the Constitutional & Common Law of the State of Missouri.
- IV. Malicious Prosecution (4th Amendment to the U.S.C.)
- V. False Arrest (4th Amendment to the U.S.C.)
- VI. Retaliation in Violation of the First Amendment [42] U.S.C. Section 1983;
- VII. Assault & Battery (Pendant Supplemental) claims & assault & battery under Missouri Law;
- VIII. Loss of Consortium (Pendant [Supplemental] Claim under Missouri State Law);
- IX. Right to Due Process Clause Fourteenth Amendment U.S.C. and comparable Missouri Constitution.

X Intentional Infliction of Emotional Distress (Federal & State Claim)

Plaintiff seeks compensatory & Punitive damages, Any court cost Legal fees & costs. Actual & Punitive Damages associated with the loss of a personal vehicle. Plaintiff seeks a trial by jury in all matters.

On November 4th 2017. Plaintiff had been walking his motor vehicle on the sidewalk of 7 highway headed south. Plaintiff put gasoline in the motor bike at Casey's General Store. 310 N. MO-7, Pleasant Hill, MO. 64080. Officer Malena initiated a citizen contact with Plaintiff. Plaintiff clearly stated that he did not wish to be contacted by Police officer Dominic Malena. Officer Malena told Plaintiff he was free to leave. As Plaintiff was exiting the premises on foot Malena had called for back-up for unknown reasons at this time.

Sgt. Todd M. Burris arrived at the Casey's as Plaintiff was leaving. Sgt. Burris drove past Plaintiff walking the scooter on the side walk and pulled into Nicks Outfitters 210 MO-7, Pleasant Hill MO 64080. Approximately .1 miles or a 3 minute walk. See Attachment #11. The plaintiff was accused of driving on 7 highway in which Sgt Burris

claims to have been searching for plaintiff.

SEE Attachment #2 (Incident report)
Plaintiff immediately bought the dashcam the very next day.

"However, unless the video tape blatantly contradicts the allegations in the complaint, the court must still accept those allegations as true See *Garcia v. Docs*, 764 F.3d 170 180 (2d Cir. 2014) citing *Scott v. Harris*, 550 U.S. 32 380 (2007); *Boyle v. Rosenberg*, 705 F.3d 603 609 (7th Cir. 2013) ("When an exhibit incontrovertibly contradicts the allegations in the complaint the exhibit ordinarily controls even when considering a motion to dismiss.")

Plaintiff asserts that there is no truth to the allegations and Sgt. Burris had invented a pre-textual stop to conduct an illegal false arrest. The dash cam blatantly contradicts the incident report.

Plaintiff had showed these tapes to the municipal judge & Jeremy Cover. Plaintiff does not believe Todd M. Burris is immunity qualified. During said Municipal trial Plaintiff asked Todd Burris if he was familiar with Missouri racial profiling policy, in which Plaintiff had learned that was what Pleasant Hill uses for guidelines for all officers. Sgt Burris stated, "Yes"

Plaintiff more specifically asked if he was familiar with the rules of a citizen contact. He said he was, & that he was aware that Plaintiff did not have to comply & was free to leave. ~~This should suffice as~~ Therefore he knew what he was doing violated Plaintiff's rights but did it anyway.

Voiding Sgt. Burris of his immunity qualification. See *Harlow v. Fitzgerald*, 457 U.S. 800, 818 (1982)

Further more Plaintiff seeks to hold the city of Pleasant Hill accountable as well because Sgt. Burris' actions were not isolated & have learned a man had died in his cell while in Sgt. Burris' custody. And his actions were done under a supervisory capacity in which he abused to teach Dominic Malena how to deal with citizens who fail to cooperate.

This is poiseness throughout the department therefore the city bears the litigation along with Sgt. Burris. In the video Sgt. Burris could not articulate why Plaintiff was to stop & throughout the dash cam & backing tapes. It's quite clear that I was arrested for "Running my mouth" a clear violation of Plaintiff's 1st amendment rights.

Dashcam also reveals the reason Sgt. Burris
(Continued on next page) See *Smith v. City of Jackson*, 513 F.3d 291, 400 Fed Appx 1000

(See *Smith v. Wade*, 461 U.S. 30, 36 (1983).)

Punitive Damages demonstrate that Burris' conduct was motivated by malice or evil intent, or acted with reckless or callous indifference to Plaintiff's Federally protected rights.

≤ The City of Pleasant Hill Missouri.

See *Kentucky v. Graham*, 473 U.S. 591 165 (1985) where as an individual-capacity suit seeks to impose personal liability on a government official for actions taken under color of state law. An official capacity suit is the equivalent of an action against the governmental entity of which the officer is an agent.

Jimillo v. Streicher 434 F.3d 461 466 (6th Cir. 2006)

The Doctrine of qualified immunity shields government officials from liability for civil damages for actions taken in the scope of their duties, unless their conduct violates "clearly established statutory or constitutional rights of which a reasonable person would have known." *Harlow v. Fitzgerald* 457 U.S. 800, 818 (1982)

See *Garcia v. Doez*, 764 F.3d 170 180 (2d Cir. 2014) citing *Scott v. Harris*, 550 U.S. 372, 380 (2007)
Boyle v. Rosenberg 705 F.3d 603 609 (6th Cir. 2013)

had his probable cause, was cause of a broken tail light. The video captures the bike getting towed with a working tail light. This case was ultimately referred to a trial de novo in Cass County Missouri & Jeremy Cover after reviewing all of these said violations continued his quest to prosecute until the day of trial. The police were supposedly too difficult to reach. Plaintiff demanded that he get his bike free of charge from Clines' auto body which Jeremy Cover agreed. (See court CD) Plaintiff reached out to Scott at Clines' auto body & ~~was~~ "Scott" admitted to speaking with ~~me~~ Jeremy Cover about the scooter & insisted on charging me \$3000 to get it out. Plaintiff seeks actual & punitive damages from Clines Auto for the loss of income due to not having a ride & the loss of freedom that comes with it.

(When an exhibit incontrovertibly contradicts the allegations in the complaint, the exhibit ordinarily controls even when considering a motion to dismiss.)

City of Pleasant Hill MO.

namest in his/her individual capacity (without the official capacity) Kentucky v. Graham 473 US 159 165 (1985) See Thorpe ex rel. DTU, Breathitt v. Bd. of Educ., 932 F Supp. 2d 799, 802 (E.D. Ky. 2013)

See Adickes v. Sh. Kress & Co. 398, U.S. 144. 150 (1970).

In determining the sufficiency of the allegations in a complaint a court may consider exhibits attached to a motion for judgment on the pleadings without converting to a motion for summary judgment so long as they are referred to in the complaint & are central to the claims contained therein.

Bassett v. Nat'l Collegiate Athletic Ass'n, 528 F.3d 426, 430 (6th Cir. 2008)

In Jones v. City of Cincinnati, the court held that even though a videotape of a police encounter could be considered in connection with a motion to dismiss, the district court was not required to do so where the videotape "captures any part of the incident & would provide a distorted view of the events at issue."

a supervisory official's failure to supervise, control or train the offending individual is not actionable unless the supervisor either encouraged the specific incident of misconduct or in some other way directly participated in it.

Count IV: "Malicious Prosecution
(Violations of the Fourth Amendment
to the U.S. C. as well as
comparable portions of the Missouri
Constitution."

Wallace v. Kato, 549 U.S. 384,
390 (2007)

malicious prosecution claim under 1983
must prove that:

- (1) a criminal prosecution was initiated against me.
- (2) there was no prob. cause to support the criminal prosecution;
- (3) I suffered deprivation e.g. liberty, apart from the initial seizure, and
- (4) criminal proceedings was resolved in my favor.

(Mitchell v. Forsyth, 472 U.S. 511, 526
(1985)).

Saucier v. Katz, 533 U.S. 194, 206 (2001).

Ashcroft v. al-Kidd, 131 S. Ct. 2074.

2085 (2011) (quoting)


Malley v. Briggs, 475 U.S. 335, 341
(1986)).

To determine whether a government official is entitled to qualified immunity we consider the two-part test described in Saucier v. Katz, which asks whether a constitutional right would have been violated on the facts alleged, & if so, whether the right was clearly established, 533 U.S. 194, 2001, 121 S.Ct. 2151, 150 L.Ed.2d 272 (2001).

We are free to address the second question first, analyzing whether the constitutional right it purportedly prohibited a defendant's conduct

was clearly established, without
addressing whether there was a constitutional
violation at all. *Pederson v. Callahan*, 555 U.S.
223, 236, 129 S.Ct. 808, 172 L.Ed.2d
365 (2009).

Occupy Nashville v. Haslam,
769 F.3d 434, 442
6th Cir. 2014.

Arrest without probable cause constitutes
an unreasonable seizure in violation of the
Fourth Amendment." 

Ingram v. City of Columbus, 185 F.3d
529, 592-93 (6th Cir. 1999) "Probable cause to
justify an arrest means facts & circumstances
within the officers knowledge that are
sufficient to warrant a prudent person,
or one of reasonable caution, in
believing, in the circumstances shown,
that the suspect has committed, is
committing, or is about to commit an
offense." *Michigan v. DeFillippo*, 443 U.S. 31,
7 (1979).

courts normally look to state law defining the offense. Id. at 36 ("To determine whether an officer had probable cause to arrest someone for violation of a state statute, courts normally look to state law defining the offense. Id. at 36 ("Whether an officer is authorized to make an arrest ordinarily depends, in the first instance, on state law"). See also Ingram, 185 F.3d at 594 ("To determine whether officers had probable cause to arrest an individual, we must look to the law of the jurisdiction at the time of the occurrence.")

At issue here is whether PO had probable cause to arrest for failing to comply.

A) Missouri law provides as follows:

As the Supreme Court held, "a defendant cannot be said to have violated a clearly established right unless the right's contours were sufficiently definite that any reasonable official in the defendant's shoes would have understood that he was violating it." Plumhoff v. Rickard, 134 S.Ct. 2012, ~~2023~~ 2014 (citing

Ashcroft v. al-Kidd, 131 S.Ct. 2074 2083-84 (2011)). An officer is entitled to qualified immunity unless existing precedent "placed the statutory or constitutional question confronted by the official 'beyond debate.'" Id. The "crucial question is whether the official acted reasonably in the particular circumstances that he/she faced."

Count 11: '42 USC § 1983 -
Unreasonable & Excessive Force (Violations
of the Fourth Amendment to the United
States Constitution, as well as
comparable portions of the Ohio
Constitution)

Slusher v. Carson, 540 F.3d 449,
453-54 (6th Cir. 2008).

(1989) Graham v. Connor, 490 U.S. 386

Clearly established right to be free from
the use of gratuitous violence during
the course of the arrest.

See Shreve v. Jessamine Cnty. Fiscal
Court, 453 F.3d 681, 688 (6th Cir. 2008).

("Cases in this circuit clearly establish the
right of people who pose no safety
risk to the police to be free from
gratuitous violence during arrest.")

3 Count III: "Municipal & Supervisory Liability (Section 1983, the Fourth Amendment [?] to the United States Constitution & the Constitutional & Common law of the State of Missouri)"

00P A municipality cannot be held liable under § 1983 merely because it employs an individual who engages in unconstitutional conduct. Rather, plaintiffs must prove that a policy or custom of the municipality was the "moving force" behind the alleged constitutional violation.

436 Monell v. Dep't. of Soc. Serv., 436 U.S. 658, 694 (1978).

Such a policy or custom may consist of:
"(1) the municipality's legislative enactments or official agency policies;

(2) Actions taken by officials with Final Decision Making Authority;
a policy of inadequate training or supervision;
a custom of tolerance or acquiescence of

federal rights violations."

Thomas v. City of Chattanooga,
398 F.3d 426, 429 (6th Cir. 2005).

Plaintiff allege that inadequacy of supervisory training was the result of deliberate indifference.

In Gannick v. Thompson, 131 S. Ct. 1350 (2011), the Supreme Court noted that "a municipality's culpability for a deprivation of rights is at its most tenuous where a claim turns on a failure to train." The failure to train must amount to a "deliberate indifference" to the rights of persons with whom the [untrained employees] come into contact. Id. at 1359 (quoting Canton v. Harris, 489 U.S. 378, 388 (1989)).

Plaintiff must allege facts sufficient to show that there was a
or a persistent pattern of unconstitutional conduct

demonstrating that the municipality had ignored a history of abuse & was clearly on notice that training in this particular area was deficient & likely to cause injury.)

D'Ambrosio v. Marino, 747 F.3d 378, 387 (6th Cir. 2014).

that there was a pattern of inadequately investigating similar claims.
Burgess, 735 F.3d at ~~478~~ 478.

(Shehee v. Luttrell 199 F.3d 295, 300 (6th Cir. 1982))

McQueen v. Beecher Community Schools, 433 F.3d 460 (6th Cir. 2006).

Hays v. Jefferson County 668 F.2d 869 874 (6th Cir. 1982)

Under Penalty of Perjury I swear to the
facts contained therein to the best of my knowledge

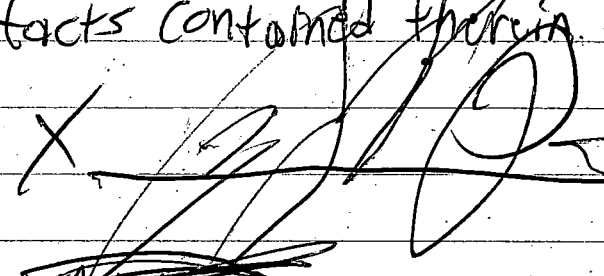
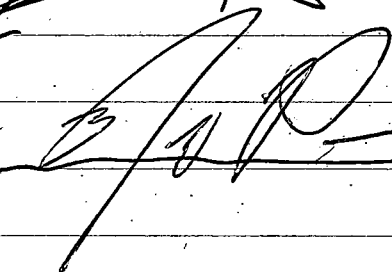
X  ~~06/26/2021~~
~~Alonzo~~
X  7/29/2021

Exhibit List

- A) Dash Cam
- B) Incident Reports
- C) Missouri Racial Profiling (packet)
- D) Radio Dispatch
- E) Maps of Pleasant Hill
- F) Digital Recorder (Audio)
- G) Emails to Casey's General
- H) Booking CD (audio/visual)
- I) CD (trial de novo)
- J) Motion to Suppress Evidence



IN THE 17th JUDICIAL CIRCUIT COURT, Harrisonville, MISSOURI

21CA-CC00158

Judge or Division: <u>17</u>	Case Number: <u>19CA-CC00285</u>
Petitioner: <u>Jeffrey M. Pearson</u>	Petitioner's Address/Telephone: <u>403 E. Broadway Street</u> <u>Jenico Springs MO, 64796</u> (660) 223-8759
Respondent: <u>City of Pleasant Hill</u> <u>ET AL</u>	Respondent's Address/Telephone: <u>203 Paul St.</u> <u>Pleasant Hill MO, 64080</u>

FILED
CIRCUIT CLERK
CASS COUNTY, MO.

21 JUL 29 PM 2:20

(Date File Stamp)

Motion and Affidavit in Support of Request to Proceed As a Poor Person

Marital Status:	If Married, Spouse's name:	Number of dependents:
-----------------	----------------------------	-----------------------

(Include Spouse's Income and Expenses if Married)

Monthly Income

Gross salary (before deductions) \$ 794⁰⁰
Public assistance \$ _____
Retirement/Pension \$ _____
Social Security \$ 794⁰⁰
Child Support \$ _____
Maintenance \$ _____
Other income to be considered \$ _____

Total Monthly Income \$ 794

Monthly Expenses

☐ Mortgage ☒ Rent Payment \$ 400 monthly
Utilities \$ 300 monthly
Food \$ "food stamps" 194
Payment on debts & credit cards \$ _____
Child Support \$ _____
Maintenance \$ _____
Medical expenses to be considered \$ _____

Total Monthly Expenses \$ 700⁰⁰

Assets

Cash on Hand \$ 0
Bank Accounts:
Checking \$ 0
Savings \$ 0
Approximate value of home \$ 0
And/or other real estate \$ 0
Approximate value of automobile(s) \$ 5723⁰⁰
(1) yr/make 2005/cadillac
(2) yr/make _____
Approximate value of personal Possessions (list)

Total Assets \$ 5723⁰⁰

Debts

Home loan balance \$ _____
Automobile loan(s) \$ 5723⁰⁰
Credit card balance(s) \$ _____
Other debts to be considered \$ _____

Total Debts \$ 5723⁰⁰

I swear/affirm under penalty of perjury that these facts are true to my best knowledge and belief.

7-29-2021

Date

[Signature]
Your Signature



Social Security Administration Benefit Verification Letter

Date: May 13, 2021
BNC#: 21HS123G78751
REF: DI

000002348 I=000000 0513 BEVE 96S



2346 1 MB 0.447



JEFFREY MICHAEL PEARSON
PO BOX 193
WARSAW MO 65355-0193

You asked us for information from your record. The information that you requested is shown below. If you want anyone else to have this information, you may send them this letter.

Information About Supplemental Security Income Payments

Beginning April 2021, the current Supplemental Security Income payment is \$794.00.

This payment amount may change from month to month if income or living situation changes.

Supplemental Security Income Payments are paid the month they are due.

(For example, Supplemental Security Income Payments for March are paid in March.)

We found that you became disabled under our rules on March 14, 2016.

Type of Supplemental Security Income Payment Information

You are entitled to monthly payments as a disabled individual.

Date of Birth Information

The date of birth shown on our records is April 4, 1984.

Suspect Social Security Fraud?

Please visit <http://oig.ssa.gov/r> or call the Inspector General's Fraud Hotline at 1-800-269-0271 (TTY 1-866-501-2101).



0101R33CQ002379 CCM.M72.BEV3P.R210513

See Next Page

If You Have Questions

We invite you to visit our web site at www.socialsecurity.gov on the Internet to find general information about Social Security. If you have any specific questions, you may call us toll-free at 1-800-772-1213, or call your local office at 1-877-405-5459. We can answer most questions over the phone. If you are deaf or hard of hearing, you may call our TTY number, 1-800-325-0778. You can also write or visit any Social Security office. The office that serves your area is located at:

SOCIAL SECURITY
3404 W 10TH
SEDALIA MO 65301

If you do call or visit an office, please have this letter with you. It will help us answer your questions. Also, if you plan to visit an office, you may call ahead to make an appointment. This will help us serve you more quickly when you arrive at the office.

Social Security Administration



IN THE 17th JUDICIAL CIRCUIT COURT, County of Cass Harrisonville MISSOURI
21CA-CC00158

Judge or Division: <u>17</u>	Case Number: <u>19CA-CC00285</u>
Petitioner: <u>Jeffrey M. Pearson</u>	Petitioner's Address/Telephone: <u>403 E. Broadway St.</u> <u>Jerice Springs Mo. 64756 (660) 223-8759</u>
Respondent: <u>City of Pleasant Hill</u> <u>et al</u>	Respondent's Address/Telephone: <u>203 Paul St.</u> <u>Pleasant Hill MO, 64080</u>

(Date File Stamp)

Order to Proceed As a Poor Person

- ☐ The Court, having considered the Motion and Affidavit in Support of Request to Proceed as a Poor Person, finds that _____ is without sufficient funds or assets with which to pay the advance deposit for costs in this action and, therefore, is granted leave to proceed as a poor person and the required advanced deposit for costs is waived.
- ☐ The Court, having considered the Motion and Affidavit in Support of Request to Proceed as a Poor Person, finds that _____ has sufficient funds or assets with which to pay the advance deposit for costs in this action, and therefore, the Motion is denied.

Date

Commissioner/Judge



In the 17th Judicial Circuit Court 21CA-CC00158
County of Cass Harrisonville, MO. Missouri

Petitioner

Jeffrey M. Pearson
403 E. Broadway St.
Jerico Springs MO
64756

Case # 19CA-CC00285

FILED
CIRCUIT CLERK
CASS COUNTY MO.

21 JUL 29 PM 2:20

V.

City of Pleasant Hill
Et AL

~~Permiss~~ Plaintiff wishes to have
summons be delivered by Sheriff upon
approval of THE COURT.

Comes now Plaintiff hereby wishes the
defendants in the above case to be served
any summons/Documentation concerning said case
to be delivered by Sheriff of Cass County Missouri
as prescribed by law.

Plaintiff
Jeffrey Michael Pearson

X

JP
7-16-2021
Amended

Circuit Court of Cass County
Division

JP 7-16-2021
Amended

Jeffrey Michael Pearson
PLAINTIFF

"Scott" Cline's Auto Body

Case # 19CA-CC00285

DEFENDANT

JP 7/16/21
Amended

FILED
CLERK
CASS COUNTY MO
JUL 29 PM 2:20

21CA-CC00158

Owner/Lienholder Petition for
Property Release

Comes Now Plaintiff Jeffrey M. Pearson
in the matter of case no. 19CA-CC00285
Hereby moves this court to release the
property held at Cline's Auto Body Shop
at 1107 Matthes, Ln. Pleasant Hill MO. 64080
And has such illegally detained such property
that is owned by the petitioner
~~That~~ been said property is as follows
Year 100 motorcycle

JP 7/16/21
Amended

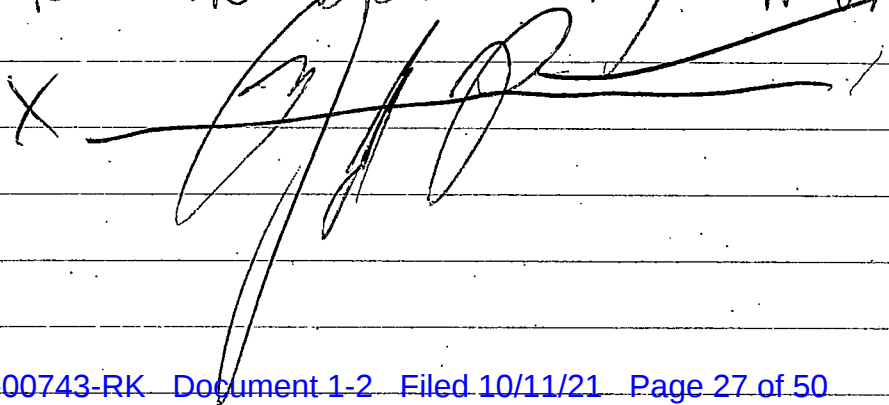
Petitioner states that on or about Nov
4th 2017 Cline's Auto Body took possession
of Plaintiff's property through police forces
after arrest. Plaintiff states that Cass County
Circuit Court under the honorable Judge
& Prosecutor Jeremy Cover of

Was & can be cross examined by CD audio of such hearing. In which the plaintiff & Prosecutor V made a verbal contract in front of ~~Said~~ ^{Said magistrate} court and while under oath. The contract consisted of Plaintiff worried about getting his scooter/motorbike back since such case had been dismissed. The P.A. Jeremy Cover stated, "I'll take care of it."

Plaintiff spoke to "Scott" at Clines Ave Body & he claimed to have spoken with Jeremy Cover but insisted it would cost Plaintiff \$250⁰⁰ - \$350⁰⁰.

Plaintiff is indigent & has made a binding contract with Jeremy Cover. If Jeremy Cover does not possess such powers to release property Plaintiff prays that the court will.

I swear under penalty of perjury the statements in this motion are true to the best of my knowledge.

X 

medicine affects me

7-16-2021

EXHIBIT B #1

Case # 19 Ct-CC05285
Plaintiff: Jeffrey M. Pearson
403 E. Broadways
Jenico Springs MO.
64456
(660) 223-8259

Defendant:
Clines Auto Body
1107 North 4th Ln
Pleasant Hill MO.
64086
Nexium
(esomeprazole magnesium)

CERTIFICATE OF ORIGIN FOR A VEHICLE

TAOTAO USA INC

DATE 06/15/2015

VEHICLE IDENTIFICATION NO L9NTELDKD8D1081606

YEAR 2013

INVOICE NO 159099
MAKE TAOTAOCHINA

BODY TYPE SCOOTER

H P (S A E) 149CC GVW/R 230 LBS

NO CYLS ONE

SERIES OR MODEL POWERMAX 150

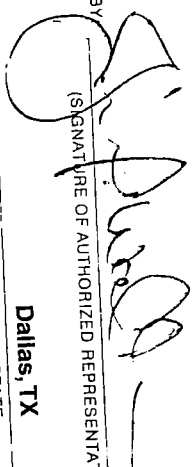
THIS VEHICLE CONFORMS TO ALL APPLICABLE FEDERAL MOTOR VEHICLE SAFETY STANDARDS AND ENVIRONMENTAL PROTECTION AGENCY REQUIREMENTS IN ACCORDANCE WITH THE NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION 50 HIGHWAY CYCLE
1459 NW US HWY 50
HOLDEN, MO 64040

I, the undersigned authorized representative of the company, firm or corporation named below, hereby certify that the new vehicle described above is the property of the said company, firm or corporation and is transferred on the above date and under the Invoice Number indicated to the following distributor or dealer.
NAME OF DISTRIBUTOR, DEALER ETC

It is further certified that this was the first transfer of such new vehicle in ordinary trade and commerce.

TAOTAO USA INC.

186396

BY 
(SIGNATURE OF AUTHORIZED REPRESENTATIVE)
Dallas, TX
CITY - STATE

7-16-2021 EXHIBIT B #1
 Case # 19 Ct-CC05285
 Plaintiff: Jeffrey M. Pearson
 403 E. Broadway
 Venice Springs MO.
 64756
 (660) 223-8329
 Defendant:
 Clines Auto Body
 1107 Mathews Ln
 Pleasant Hill MO.
 64086
 Nexium®
 (esomeprazole magnesium)

LIENHOLDER	ODOMETER DISCLOSURE FOR RETAIL SALE	DISTRIBUTION DEALER ASSIGNMENT NUMBER 1	DISTRIBUTION DEALER ASSIGNMENT NUMBER 2	DISTRIBUTION DEALER ASSIGNMENT NUMBER 3	DISTRIBUTION DEALER ASSIGNMENT NUMBER 4
NAME OF PURCHASER: Jeffrey M. Pearson ADDRESS: 403 E. Broadway CITY: Venice Springs STATE: MO. ZIP: 64756 PHONE: (660) 223-8329	I, the undersigned, being the registered owner of the vehicle, hereby certify that the odometer reading is correct to the best of my knowledge and belief. The odometer reading is 28645 miles. I declare under penalty of perjury that the foregoing is true and correct. Executed on 07/16/2021 at Venice Springs, MO.	NAME OF DISTRIBUTION DEALER: Clines Auto Body ADDRESS: 1107 Mathews Ln CITY: Pleasant Hill STATE: MO. ZIP: 64086 PHONE: (660) 223-8329	NAME OF DISTRIBUTION DEALER: Clines Auto Body ADDRESS: 1107 Mathews Ln CITY: Pleasant Hill STATE: MO. ZIP: 64086 PHONE: (660) 223-8329	NAME OF DISTRIBUTION DEALER: Clines Auto Body ADDRESS: 1107 Mathews Ln CITY: Pleasant Hill STATE: MO. ZIP: 64086 PHONE: (660) 223-8329	NAME OF DISTRIBUTION DEALER: Clines Auto Body ADDRESS: 1107 Mathews Ln CITY: Pleasant Hill STATE: MO. ZIP: 64086 PHONE: (660) 223-8329

NOTICE OF ENTRY
(SUPREME COURT RULE 74.03)

In The 17th Judicial Circuit Court, Cass County, Missouri
CASS COUNTY JUSTICE CENTER, 2501 WEST MECHANIC, HARRISONVILLE, MISSOURI 64701

JEFFREY M PEARSON V CITY OF PLEASANT HILL ET AL

CASE NO : 21CA-CC00158

To: File

YOU ARE HEREBY NOTIFIED that the court duly entered the following:

Filing Date **Description**

09-Aug-2021 Notice of Court Hearing Sent

Hearing Scheduled

Court sets case for an in person hearing on September 7, 2021 at 2:30 pm

Scheduled For: 07-Sep-2021 2:30 PM; WILLIAM B COLLINS; DIVISION I COURTROOM; Cass
IN PERSON HEARING

Event Location: Cass County Justice Center, 2501 West Mechanic, Harrisonville, Mo



Clerk of Court

CC: File
JEFFREY M PEARSON

ECC:

Date Printed : 09-Aug-2021

Sep. 7th 2021

17th Judicial Circuit Court,
Cass County, Missouri ~~&~~ Harrisonville, MO.

Plaintiff:

Jeffrey M. Pearson
403 E. Broadway St,
Jerico Springs MO,
phone # (660) 223-8259 6456

V.

Case NO: 21CA-CC00158

21 SEP -7 PM 3:40
FILED
CIRCUIT CLERK
CASS COUNTY, MO.

Defendant:

City of Pleasant Hill Missouri
ET-AL

~~Request~~ Request for Summons
via certified mail.

x 

✓

Page 1 of 3

17th Judicial Circuit Court
Cass County State of Missouri

Case No: 21CA-C00058

Filed Sept. 7th 2021

Plaintiff:
Jeffrey M. Pearson
403 E. Broadway St.
Jerico Springs, MO.
64756
(660) 223-8759

21 SEP - 7 PM 3:53
FILED
CIRCUIT CLERK
CASS COUNTY, MO.

v.

Defendant:
City of Pleasant Hill
Et-Al "CLINES AUTOBODY"

Motion to force the release
of property rightfully owned by
the plaintiff & illegally detained
by the Defendant "Clines Auto Body"

COMES NOW: Plaintiff prays that this
court through the honorable judge William

Handwritten notes and scribbles, including the word "NOTED" and various illegible markings.

Collins will grant relief to plaintiff in that Cline's Auto-Body has been in possession of Plaintiff's motorcycle for over a period of over 4 years. In doing so Defendant has left the plaintiff at a serious disadvantage in society as he is disabled not able to make many doctor appointments & was unable to care for himself without his transportation. Plaintiff was impotent in that he was unable to move the court with more confidence & Plaintiff only just now has become as mobile as he was when Cline's Auto-Body came into possession of Plaintiff's transportation. Plaintiff has made several attempts to retrieve his bike & was sent away empty handed or sometimes "Scott" would say plaintiff owed \$300.00 and would have to pay the

Page 3 of 3
sum in full in order to leave with
his bike. Plaintiff properly refused
as according to Missouri Law
"when a defendant in a case has
the entire case dismissed any
debts incurred by the case
itself must be paid for by
the party that did NOT prevail."

September 7th 2021

Plaintiff Jeffrey M. Pearson

X 

I swear under penalty of perjury that the
above facts are all true to the best of my knowledge



IN THE 17TH JUDICIAL CIRCUIT COURT, CASS COUNTY, MISSOURI

Judge or Division: WILLIAM B COLLINS	Case Number: 21CA-CC00158	(Date File Stamp)
Plaintiff/Petitioner: JEFFREY M PEARSON	Plaintiff's/Petitioner's Attorney/Address:	
vs.		
Defendant/Respondent: CITY OF PLEASANT HILL	Court Address: Cass County Justice Center 2501 West Mechanic HARRISONVILLE, MO 64701	
Nature of Suit: CC Other Miscellaneous Actions		

Summons for Service by Registered or Certified Mail

The State of Missouri to: CITY OF PLEASANT HILL

Alias:

CITY HALL
203 PAUL
PLEASANT HILL, MO 64080

COURT SEAL OF



CASS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner, or Plaintiff/Petitioner, if pro se, at the above address all within 30 days after the return registered or certified mail receipt signed by you has been filed in this cause. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in the petition.

/s/ Kim York, Circuit Clerk, 9/8/2021, 08:40 AM

Date Issued

Clerk

Further Information:

Certificate of Mailing

I certify that on 9/8/21 (date), I mailed a copy of this summons and a copy of the petition to Defendant/Respondent CITY OF PLEASANT HILL by registered or certified mail, requesting a return receipt by the addressee only, to the said Defendant/Respondent at the address furnished by Plaintiff/Petitioner.

/s/ Kim York, Circuit Clerk, 9/8/2021, 08:40 AM

Date

Clerk



IN THE 17TH JUDICIAL CIRCUIT COURT, CASS COUNTY, MISSOURI

Judge or Division: WILLIAM B COLLINS	Case Number: 21CA-CC00158	(Date File Stamp)
Plaintiff/Petitioner: JEFFREY M PEARSON	Plaintiff's/Petitioner's Attorney/Address:	
vs.		
Defendant/Respondent: CITY OF PLEASANT HILL	Court Address: Cass County Justice Center 2501 West Mechanic HARRISONVILLE, MO 64701	
Nature of Suit: CC Other Miscellaneous Actions		

Summons for Service by Registered or Certified Mail

The State of Missouri to: CLINES AUTO BODY

Alias:

1107 MATTHES LANE
PLEASANT HILL, MO 64080

COURT SEAL OF



CASS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner, or Plaintiff/Petitioner, if pro se, at the above address all within 30 days after the return registered or certified mail receipt signed by you has been filed in this cause. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in the petition.

/s/ Kim York, Circuit Clerk, 9/8/2021, 08:43 AM

Date Issued

Clerk

Further Information:

Certificate of Mailing

I certify that on 9/8/21 (date), I mailed a copy of this summons and a copy of the petition to Defendant/Respondent CLINES AUTO BODY by registered or certified mail, requesting a return receipt by the addressee only, to the said Defendant/Respondent at the address furnished by Plaintiff/Petitioner.

/s/ Kim York, Circuit Clerk, 9/8/2021, 08:43 AM

Date

Clerk



IN THE 17TH JUDICIAL CIRCUIT COURT, CASS COUNTY, MISSOURI

Judge or Division: WILLIAM B COLLINS	Case Number: 21CA-CC00158	(Date File Stamp)
Plaintiff/Petitioner: JEFFREY M PEARSON	Plaintiff's/Petitioner's Attorney/Address:	
vs.		
Defendant/Respondent: CITY OF PLEASANT HILL	Court Address: Cass County Justice Center 2501 West Mechanic HARRISONVILLE, MO 64701	
Nature of Suit: CC Other Miscellaneous Actions		

Summons for Service by Registered or Certified Mail

The State of Missouri to: TODD BURRIS (SERGEANT)

Alias:

PLEASANT HILL POLICE DEPT
203 PAUL ST
PLEASANT HILL, MO 64080

COURT SEAL OF



CASS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner, or Plaintiff/Petitioner, if pro se, at the above address all within 30 days after the return registered or certified mail receipt signed by you has been filed in this cause. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in the petition.

/s/ Kim York, Circuit Clerk, 9/8/2021, 08:46 AM

Date Issued

Clerk

Further Information:

Certificate of Mailing

I certify that on 9/8/21 (date), I mailed a copy of this summons and a copy of the petition to Defendant/Respondent TODD BURRIS (SERGEANT) by registered or certified mail, requesting a return receipt by the addressee only, to the said Defendant/Respondent at the address furnished by Plaintiff/Petitioner.

/s/ Kim York, Circuit Clerk, 9/8/2021, 08:46 AM

Date

Clerk



IN THE 17TH JUDICIAL CIRCUIT COURT, CASS COUNTY, MISSOURI

Judge or Division: WILLIAM B COLLINS	Case Number: 21CA-CC00158	(Date File Stamp)
Plaintiff/Petitioner: JEFFREY M PEARSON	Plaintiff's/Petitioner's Attorney/Address:	
vs.		
Defendant/Respondent: CITY OF PLEASANT HILL	Court Address: Cass County Justice Center 2501 West Mechanic HARRISONVILLE, MO 64701	
Nature of Suit: CC Other Miscellaneous Actions		

Summons for Service by Registered or Certified Mail

The State of Missouri to: DOMINIC MOLENA (POLICE OFFICER)

Alias:

PLEASANT HILL POLICE DEPT
203 PAUL STREET
PLEASANT HILL, MO 64080

COURT SEAL OF



CASS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner, or Plaintiff/Petitioner, if pro se, at the above address all within 30 days after the return registered or certified mail receipt signed by you has been filed in this cause. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in the petition.

/s/ Kim York, Circuit Clerk, 9/8/2021, 08:49 AM

Date Issued

Clerk

Further Information:

Certificate of Mailing

I certify that on 9/8/21 (date), I mailed a copy of this summons and a copy of the petition to Defendant/Respondent DOMINIC MOLENA (POLICE OFFICER) by registered or certified mail, requesting a return receipt by the addressee only, to the said Defendant/Respondent at the address furnished by Plaintiff/Petitioner.

/s/ Kim York, Circuit Clerk, 9/8/2021, 08:49 AM

Date

Clerk



IN THE 17TH JUDICIAL CIRCUIT COURT, CASS COUNTY, MISSOURI

Judge or Division: WILLIAM B COLLINS	Case Number: 21CA-CC00158	(Date File Stamp)
Plaintiff/Petitioner: JEFFREY M PEARSON	Plaintiff's/Petitioner's Attorney/Address:	
vs.		
Defendant/Respondent: CITY OF PLEASANT HILL	Court Address: Cass County Justice Center 2501 West Mechanic HARRISONVILLE, MO 64701	
Nature of Suit: CC Other Miscellaneous Actions		

Summons for Service by Registered or Certified Mail

The State of Missouri to: JEREMY COVER

Alias:

OFFICIAL CAPACITY: MUN. P A
LAUBER MUNICIPAL LAW LLC
250 TUDOR RD
LEES SUMMIT, MO 64086

COURT SEAL OF



CASS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner, or Plaintiff/Petitioner, if pro se, at the above address all within 30 days after the return registered or certified mail receipt signed by you has been filed in this cause. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in the petition.

/s/ Kim York, Circuit Clerk, 9/8/2021, 08:51 AM

Date Issued

Clerk

Further Information:

Certificate of Mailing

I certify that on 9/8/21 (date), I mailed a copy of this summons and a copy of the petition to Defendant/Respondent JEREMY COVER by registered or certified mail, requesting a return receipt by the addressee only, to the said Defendant/Respondent at the address furnished by Plaintiff/Petitioner.

/s/ Kim York, Circuit Clerk, 9/8/2021, 08:51 AM

Date

Clerk



IN THE 17TH JUDICIAL CIRCUIT COURT, CASS COUNTY, MISSOURI

Judge or Division: WILLIAM B COLLINS	Case Number: 21CA-CC00158	(Date File Stamp)
Plaintiff/Petitioner: JEFFREY M PEARSON	Plaintiff's/Petitioner's Attorney/Address:	
vs.		
Defendant/Respondent: CITY OF PLEASANT HILL	Court Address: Cass County Justice Center 2501 West Mechanic HARRISONVILLE, MO 64701	
Nature of Suit: CC Other Miscellaneous Actions		

Summons for Service by Registered or Certified Mail

The State of Missouri to: LAUBER MUNICIPAL LAW LLC
Alias:

250 NE TUDOR RD
LEES SUMMIT, MO 64086

COURT SEAL OF



CASS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner, or Plaintiff/Petitioner, if pro se, at the above address all within 30 days after the return registered or certified mail receipt signed by you has been filed in this cause. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in the petition.

/s/ Kim York, Circuit Clerk, 9/8/2021, 08:54 AM

Date Issued

Clerk

Further Information:

Certificate of Mailing

I certify that on 9/8/21 (date), I mailed a copy of this summons and a copy of the petition to Defendant/Respondent LAUBER MUNICIPAL LAW LLC by registered or certified mail, requesting a return receipt by the addressee only, to the said Defendant/Respondent at the address furnished by Plaintiff/Petitioner.

/s/ Kim York, Circuit Clerk, 9/8/2021, 08:54 AM

Date

Clerk

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Lauber Municipal Law LLC
250 NE Tudor Rd
Lee's Summit, MO 64086



9590 9402 6194 0220 8439 42

21CA-CC00158

2. Article Number (Transfer from service label)

7017 2170 0000 7598 8112

COMPLETE THIS SECTION ON DELIVERY

A. Signature

x S. Willis C-40

☒ Agent

☐ Addressee

B. Received by (Printed Name)

COVID-19

C. Date of Delivery

9/14/21

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below:

☐ No

21-SMCM-148

3. Service Type

☐ Adult Signature

☐ Adult Signature Restricted Delivery

☒ Certified Mail®

☐ Certified Mail Restricted Delivery

☐ Collect on Delivery

☐ Collect on Delivery Restricted Delivery

☐ Insured Mail

☐ Restricted Delivery

☐ Priority Mail Express®

☐ Registered Mail™

☐ Registered Mail Restricted Delivery

☒ Signature Confirmation™

☐ Signature Confirmation

Restricted Delivery

USPS TRACKING #



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

9590 9402 6194 0220 8439 42

United States
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box •

FILED

CASS CTY CIRCUIT COURT
2501 W MECHANIC
HARRISONVILLE, MO 64701

SEP 16 2021

CASS COUNTY CIRCUIT CLERK

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Dominic Molena
Pleasant Hill Police Dept
203 Paul Street
Pleasant Hill, MO 64080



9590 9402 6194 0220 8439 66

2ICA-CC00158

2. Article Number (Transfer from service label)

7019 2970 0000 7598 8099

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

Ramy Johas

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

21-SMCM-146

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail

☐ Priority Mail Express®☐ Registered Mail™☐ Registered Mail Restricted Delivery☒ Signature Confirmation™☐ Signature Confirmation Restricted Delivery

Restricted Delivery

USPS TRACKING #



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

9590 9402 6194 0220 8439 66

United States
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box•

CASS CTY CIRCUIT COURT
2501 W MECHANIC
HARRISONVILLE, MO 64701

FILED

SEP 16 2021

CASS COUNTY CIRCUIT CLERK

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Todd BURRIS, Agent
Pleasant Hill Police Dept.
203 Paul
Pleasant Hill, MO 64086



9590 9402 6194 0220 8439 73

2/CA-CC00158

2. Article Number (Transfer from service label)

7034 2410 0000 7598 0002

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

21-SMCM-145

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☒ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

10) Mail Restricted Delivery

USPS TRACKING #



KANSAS CITY 640

14 SEP 2021 PM 3 L



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

9590 9402 6194 0220 8439 73

United States
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box •

FILED

SEP 16 2021

CASS CTY CIRCUIT COURT
2501 W MECHANIC
HARRISONVILLE, MO 64701

CASS COUNTY CIRCUIT CLERK

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

City of Pleasant Hill
City Hall
203 Paul
Pleasant Hill, MO 64080



9590 9402 6194 0220 8440 00

21CA 6600158

2. Article Number (Transfer from service label)

7014 2970 0000 7598 0068

COMPLETE THIS SECTION ON DELIVERY

A. Signature

Cheryl Johnson ☐ Agent ☒ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

21-SMCM-143

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☒ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

Restricted Delivery

USPS TRACKING #



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

9590 9402 6194 0220 8440 00

United States
Postal Service

FILED

SEP 16 2021

• Sender: Please print your name, address, and ZIP+4® in this box •

CASS CTY CIRCUIT COURT
2501 W MECHANIC
HARRISONVILLE, MO 64701

CLERK

CASS COUNTY CIRCUIT

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